

**DEPARTMENT OF FOOD AND AGRICULTURE**

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A.G. KAWAMURA, Secretary



July 5, 2005

**To:** Neil Hammerschmidt, Animal Identification Officer, Eradication and Surveillance Team  
APHIS, 4700 River Road Unit 43, Riverdale, MD 20737-1231

**Subject: COMMENTS ON DOCKET NUMBER 05-015-1, NATIONAL ANIMAL IDENTIFICATION SYSTEM; NOTICE OF AVAILABILITY OF A DRAFT STRATEGIC PLAN AND DRAFT PROGRAM STANDARDS**

The California Department of Food and Agriculture (CDFA) commends the United States Animal Identification Team for leading the way in the design and implementation of the National Animal Identification System (NAIS). We are aware of the difficulties in bringing together individuals, organizations and agencies to dialogue in such a complex issue. The objective of the current plan to enhance traceability of animal diseases will provide a critical and necessary tool for federal and state animal health officials to manage their programs.

As the agency in California responsible for managing statewide animal health programs, we support national standards for premises and animal identification, and animal movement. We also applaud the formation of Species Working Groups, which will be developing recommendations and transition plans for each animal species. Strong participation and input from all stakeholders is critical to a successful program. The CDFA is also supportive of the proposal for states to manage premises information since almost every state has programs outside the scope of NAIS that also involves livestock premises. We endorse USDA's call to maintain the information in a centralized federal system, but would not be opposed to a private sector managed database if immediate and uninterrupted access to all species information by authorized animal health officials were guaranteed.

We believe a successful animal identification system must start with attainable goals in order to receive the cooperation of the numerous entities involved in livestock production. Therefore, we recommend that the United States Department of Agriculture (USDA) develop national guidelines and regulations that can be reasonably followed by producers and enforced by federal and state agencies. The CDFA supports a voluntary program transitioning to mandatory beginning with identification of premises and animals that are at a higher risk to become infected or exposed with diseases or conditions of concern. High-risk premises are those with heavy animal commingling or those receiving animals from high-risk areas. Animal identification should follow similar development and should include animals moving through international and interstate borders. Once the infrastructure, technology and processes are implemented into livestock commerce, additional premises and animals can be included in the program as needed.

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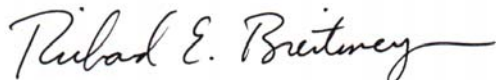
The collection of animal movement information and its reporting are perhaps the most complex part of this initiative. Currently, the infrastructure and technology to capture animal movement information without compromising the "speed of commerce" is inadequate. Unless sufficient funding, infrastructure, reliable technology, and uniform state and federal legislation are in place by the announced timeline, we believe it is unlikely that a successful animal movement-reporting program can be implemented. We recommend the USDA continue to fund initiatives to test technology and processes that will aid advancement of animal movement collection and reporting.

From a state perspective, the proposed approach to implement NAIS, from Stage I to a State V of full compliance, presents many challenges. Although it does provide a framework for implementation, it places most of the burden of implementing NAIS to the states and tribal nations. This initiative, unlike traditional eradication programs, encompasses multiple species and production sectors making implementation extremely complex. Furthermore, the proposed plan does not outline the level of funding to the states to meet compliance. An example of how difficult and costly it would be for states to comply with the document guidelines is the proposal that the states annually update premises contact information. In California, over 80,000 official premises identification numbers have been issued to date and, depending on the final interpretation of "eligible premises", it could quickly escalate to insurmountable numbers. Updating the information on an annual basis would not only be expensive but difficult since the contact may need to be made in many languages. Lastly, legislation will need to be enacted at the state level to address several aspects of the plan, such as mandatory premises registration and intrastate animal movement, and confidentiality of information. This will be difficult to accomplish by the published timeline. We proposed that the implementation approach be revisited with all of the state animal health officials.

Attached is a document containing answers to the specific questions APHIS has posed in Docket number 05-015-1. We have also addressed references to some items in the NAIS Program Standards which we recommend be deleted, modified or inserted into the plan.

Again, we appreciate the efforts of all involved in the development of this plan, and hope you will address our suggested changes as you bring to fruition the creation of a national animal identification program. The success of this plan is critical to both the efficient and effective management of our animal health programs at the state and federal levels, and also for maintaining and enhancing consumer and trading partners' confidence in our food supply.

Sincerely,

A handwritten signature in cursive script, reading "Richard E. Breitmeyer".

Dr. Richard E. Breitmeyer  
State Veterinarian

Attachment

## **ANSWERS TO QUESTIONS IN APHIS DOCKET NUMBER 05-015-1.**

### **Question 1**

***The Draft Strategic Plan calls for making the entire system mandatory by January 2009. Is a mandatory identification program necessary to achieve successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.***

A reliable animal movement tracking system is essential to quickly and effectively trace animal diseases. This is the case for surveillance programs such as bovine brucellosis and tuberculosis, and BSE where most sampling is performed at slaughter and lack of effective animal identification and animal movement records compounds the traceback of suspicious or positive samples. Furthermore, a system for rapid traceback would be even more important in controlling fast-moving diseases such as foot and mouth disease. We believe a voluntary program with phased in mandatory premises and animal identification will likely be more effective. Mandatory animal movement record keeping by producers could precede mandatory animal movement reporting.

### **Question 2**

***In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.***

In many situations it is essential to trace animal movements to the farm of origin. To preserve chain of custody, the responsibility to identify the animals should not be transferred from the source premises to others unless it is mutually and legally agreed upon.

### **Question 3**

***In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have the facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites, which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, i.e., can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms? Please give the reasons for your response.***

These facilities, tagging sites, should be able to offer this service and in some cases will be the only viable option for producers that do not have adequate facilities or are not aware of the requirements.

### **Question 4**

***The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?***

This is probably one of the most complex aspects of this program and it will require adequate infrastructure to meet compliance. First, we recommend that the USDA continue funding Cooperative Projects with states and tribal nations to address regional differences in production practices. For instance, collecting and reporting cattle movement information in the vast regions of the west will most likely be different than in the northeastern states. Additionally, USDA should work with service providers already working with producers to offer these services. Initial focus should be directed to find solutions for higher risk movements such as those through markets, international imports, and certain exhibitions. In states where brand inspection is available, for cattle and other inspected animals, the existing work force should be utilized to collect and report the information.

#### **Question 5**

***USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? Please give the reasons for your response.***

It is important to recognize that knowledge of an animals' birth date (age) can significantly aid animal health officials in the traceback of certain diseases. In tracing tuberculosis, BSE and other diseases, this is a factor that can help narrow the scope of an investigation. However, we recognize that in many situations, such as cattle and sheep on rangeland, it is difficult to identify the animal at birth. Therefore, we recommend that when possible animals be identified at birth, but when not feasible be identified before they enter commerce and producers maintain records on approximate birth date.

#### **Question 6**

***Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time), or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)? Please give the reasons for your response.***

The January 2009 target date for making the entire system mandatory for **all species** will be difficult to accomplish with current federal and states legislation, funding, and infrastructure. The means to identify an animal or group/lot varies across species and production practices, and with the exception of the Cattle Species Working Group, no other group has reached consensus on this issue. Furthermore, it appears that the technology for electronic identification of livestock and the collection of information still needs to mature to accommodate the "speed of commerce". Unless significant progress is made in these areas in the near future, we recommend the USDA in consultation with state animal health officials and species working groups review the timetable for animal identification and animal movement reporting.

#### **Question 7**

***Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed? Please give the reasons for your response.***

Although some diseases can affect multiple animal species (ie foot and mouth disease, vesicular stomatitis, etc) it is unlikely that resources are currently available to meet NAIS development for all species at the same time. We suggest that animal health officials in consultation with the different Species Working Groups prioritize implementation.

#### **Question 8**

***What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd-management computer system, mail, phone, third-party submission of data)? Does the type of entity (e.g., producer, market, slaughterhouse), the size of the entity, or other factors make some methods for information submission more or less practical, costly, or efficient? Please provide supporting information if possible.***

The most cost-effective way to obtain critical animal movement information is for producers to do it in a way that is “transparent” to their production practices. This means that collection of animal movement information should be incorporated into their daily activities. USDA should work with service providers to explore solutions for producers to easily collect and report information.

#### **Question 9**

***We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?***

All information should be confidential. Release of animal movement information and premises locations on a regional, state or national basis could facilitate the intentional introduction and spread of animal diseases or other agents.

#### **Question 10**

***The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?***

We recommend the buyer or the receiving premises be the one to report the animal movement but also require the seller to maintain a record of the transaction.

#### **Question 11**

***A key issue in the development of the NAIS concerns the management of animal tracking information. Animal health officials must have immediate, reliable, and uninterrupted access to essential NAIS information for routine surveillance activities and in the event of a disease outbreak. APHIS determined that this goal could best be achieved by having the data repositories managed by APHIS. The Draft Program Standards document provides for two main NAIS information repositories: The National Premises Information Repository and the National Animal Records Repository. The National Premises Information Repository would maintain data on each production and animal holding location (contact name, address, phone number, type of operation, etc.). The National Animal Records Repository would maintain animal identification and movement data.***

***Recently, however, an industry-led initiative suggested a privately managed database as an alternative for the management of data on animal tracking in the NAIS. The industry group stated that a private database would ensure that the needs of both government and industry would be fulfilled, and that the flow of information throughout the NAIS would be maintained in a secure and confidential manner.***

***APHIS is requesting comment from stakeholders regarding the utility of a privately managed database for holding animal location and movement information. Among the issues you may wish to comment on are the following:***

- a) ***How should a private database system be funded? Please give the reasons for your response.***
- b) ***Should the NAIS allow for multiple privately managed databases? Please explain why or why not. Should a public (government) system be made available as well as a privately managed system so that producers would have a choice? Please give the reasons for your response.***
- c) ***Should a privately managed system include all species? Please give the reasons for your response.***
- d) ***Would either system work equally well at the State level? Please explain why or why not.***

CDFA supports USDA's call for a federally centralized database repository of NAIS information as long as it allows state animal health officials access to their state's information. However, CDFA is open to the concept of a privately funded and managed database as long as it can meet all the needs of state and federal animal health programs. The following could be some of the challenges of a private system:

- a) Will all the segments of the animal agriculture industry be able to reach consensus on how it should be funded and managed?
- b) Can a private sector system maintain a government-mandated program?
- c) One of the arguments for a privately managed system is associated with maintaining the information confidential. However, unless legislation is passed to explicitly protect NAIS information from public records requests, some of the information may still be available under state and federal public records laws request even if it is maintained in the private sector.

Specific Comments to NAIS Program Standards		
Issue	Concern	Recommendation
<i>Premises Data Element Standards</i>		
1. <i>Zip/Postal code</i>	1. Field should not be numeric as it contains dashes and will not be used for calculations.	1. Change data type to text.
2. <i>Phone Number</i>	2. Field should not be numeric as it contains dashes and will not be used for calculations	2. Change data type to text.
3. <i>Alphanumeric fields</i>	3. Alphanumeric is not a recognized data type.	3. Change data type to text.
4. <i>Operation type</i>	4. As a single character field limited to 26 operation types; only allows for the designation of one operation type per premises.	4. Expand operation type field to allow for full description operations using a controlled vocabulary.
5. <i>Reason retired</i>	5. No reason to limit to a single character. Coding is a data capture implementation issue not a database issue.	5. Expand reason retired field to allow for full description operations using a controlled vocabulary. Database should be as unambiguous as possible.

Specific Comments to NAIS Program Standards		
Issue	Concern	Recommendation
<p><i>List Codes</i></p> <p>1. <i>Species</i></p> <p>2. <i>Sex</i></p> <p>3. <i>Operation type</i></p>	<p>1. Use of mnemonic codes is not maintainable as the species list increases in size; Data should not be pre-aggregated, e.g. cattle and bison under bovine.</p> <p>2. Sex is an outmoded moniker for gender.</p> <p>3. Operation type list is too constrained and does not include other animal and animal product related premises (processing plants, feed stores); Use of mnemonic codes is not maintainable as the operation type list increases in size.</p>	<p>1. Capture and spell out species names using a controlled vocabulary. Do not aggregate species.</p> <p>2. Change to gender and spell out using a controlled vocabulary.</p> <p>3. Concepts should be expanded to include all premises that have been listed as non-producer participants. Capture and spell out operation types using a controlled vocabulary. Do not aggregate operation types under a single name.</p>
<p><i>Group/Lot Identification</i></p>	<p>Current system does not allow for more than one group per premises per day. This will not work in many situations.</p>	<p>Modify current format to allow for unique group/lot ID.</p>



Specific Comments to NAIS Program Standards		
Issue	Concern	Recommendation
<p><i>Premises registration</i></p> <p>The premises identification data would be administered in a Premises Registration System used by the State/tribe. In some States/reservations, the producer, or agent for the producer, would provide the information. Additionally the State/tribe could “merge” or integrate data from existing databases or use a combination of both methods to obtain the premises information.</p>	<p>The statement on the enrollment of premises does not include situations when animal health officials must initiate premises registration in the course of regulatory activities.</p>	<p>The premises identification data would be administered in a Premises Registration System used by the State/tribe. In some States/reservations, the producer, or agent for the producer, <b>or an authorized animal health official</b> would provide the information. Additionally the State/tribe could “merge” or integrate data from existing databases or use a combination of both methods to obtain the premises information.</p>
<p>Data Validation</p>	<p>Many of the data validation issues can be addressed by standardized messaging structures and controlled terminologies.</p>	<p>Use XML schemas as the transmission format.</p>
<p><i>Data File Transmission</i></p>	<p>Transmission format is not defined in the plan. This needs to be defined at the outset to minimize transmission incompatibilities.</p>	<p>Restrict messaging to XML because of its self-documenting and self-validating properties.</p>